

March 30, 2012

**HIGHLY CONFIDENTIAL INFORMATION – SUBJECT TO SECOND
PROTECTIVE ORDER IN WC DOCKET NOS. 10-90 AND 05-337 BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION – REDACTED FOR PUBLIC
INSPECTION**

BY HAND DELIVERY & ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, D.C. 20554

Re: *Wireline Competition Bureau Seeks Comment on Potential Data
for Connect America Fund Phase One Incremental Support*, FCC
Public Notice in WC Dockets 10-90 and 05-337, DA 12-137
(Wireline Competition Bur., rel. Feb. 6, 2011) (“*CAF I Wire
Center Public Notice*”);
Second Protective Order in WC Docket Nos. 10-90 and 05-337,
DA 12-192 (Wireline Competition Bur., rel. Feb. 10, 2012)

Dear Ms. Dortch:

Pursuant to the *CAF I Wire Center Public Notice* and *Second Protective Order* cited above, Alaska Communications Systems Group, Inc., on behalf of its four incumbent local exchange carrier subsidiaries (“ACS”), hereby supplements the data it filed on February 29 and March 9, 2012, to be used in the calculation of the incremental support amounts that will be made available under the Connect America Fund (“CAF”) Phase I mechanism.

ACS previously calculated the number of business locations in each wire center, the total customer locations (business plus residential) in each wire center, the square mileage of each wire center, the total number of road feet in each wire center, and the distance to the nearest adjacent wire center as requested in paragraph 4 of the *CAF I Wire Center Public Notice*. Upon request of the staff, ACS has further broken the data down to the *census block* level for each ACS wire center (using centroids to assign census blocks to their corresponding wire centers).

Previously ACS estimated the number of business locations relative to households in each wire center. In the data filed today, ACS has updated the business locations based on data from commercially available sources. These data have allowed

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ACS to determine the number of business locations at the census block level, which are presented here, rolled up by wire center.

With this filing, ACS provides the data necessary for calculation of support using the high-cost model consistent with the FCC's approach. The spreadsheet attached hereto provides these data as well as the density for each ACS wire center, representing the sum of the densities of each census block with a centroid in the wire center.

Certain of the information filed herewith is proprietary and highly confidential to ACS. If released to competitors or others with whom ACS does business, it could allow those persons to gain a significant advantage in the marketplace or in negotiations. It meets the definition of Highly Confidential Information set forth in the Second Protective Order cited above. Therefore, ACS has marked each page of its Stamped Highly Confidential Documents with the legend required in paragraph 5 of the Second Protective Order, indicating it is Highly Confidential Information, and has indicated that the documents contain such sensitive information that the copying of the Stamped Highly Confidential Documents is restricted, as provided for in paragraph 6 of the Second Protective Order.

ACS is filing herewith one copy of ACS's Stamped Highly Confidential Documents as defined in the Second Protective Order, and two redacted copies. ACS also provides two copies of each Stamped Highly Confidential Document for Katie King. Please direct any questions regarding this matter to me.

Very truly yours,

/s/

Karen Brinkmann
*Counsel for Alaska Communications Systems
Group, Inc.*

cc: Steven Rosenberg, Wireline Competition Bureau
Katie King, Special Counsel, Telecommunications Access Policy Division
("TAPD"), Wireline Competition Bureau
Joseph Cavender, TAPD, Wireline Competition Bureau
Charles Tyler, TAPD, Wireline Competition Bureau